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October 28, 2020

VIA ECF

Honorable Laura Taylor Swain
United States District Court Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

**RE: *United States v. Mircea Constantinescu*
19-cr-651 (LTS)**


Dear Judge Swain:

This letter is submitted on behalf of my client, Mr. Mircea Constantinescu, to respectfully request the Court modify the terms of Mr. Constantinescu's pretrial release to permit him to travel to the Districts of New Jersey, Massachusetts, and the Eastern District of Pennsylvania as necessary for his employment.

Currently, Mr. Constantinescu's travel is limited to the Southern and Eastern Districts of New York. Mr. Constantinescu works for a transportation company that contracts with different airlines to transport flight crews between airports and hotels. Mr. Constantinescu's job needs him to be able to travel to the airports in Newark, NJ, Boston, MA, and Philadelphia, PA, in order to pick up passengers. It is requested that Mr. Constantinescu be permitted to travel to these airports without prior permission from the Court. Mr. Constantinescu will inform his Pretrial Services Officer in advance of any trips. His travel will be limited to only what is necessary for his employment.

Both the government and Pretrial Services have been informed of this request and they do not oppose it, provided that the conditions above – prior notice and travel limited to employment – are met.

Respectfully submitted,


Meredith S. Heller

The requested modification, subject to the restrictions outlined above, is granted.

SO ORDERED.

10/28/2020

/s/ Laura Taylor Swain, USDJ

Cc: A.U.S.A. Robert B. Sobelman (via ECF)
A.U.S.A. Elizabeth A. Hanft (via ECF)
A.U.S.A. Daniel Loss (via ECF)
P.T.S.O. Rena Bolin (via email)